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United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	ID0000019	170309	C	R	2

Remarks

21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

Potlatch Corporation - St. Maries Complex
2200 Railroad Avenue, St. Maries, ID 83861

Entry Time/Date	Permit Effective Date
10:02AM / 3/9/2017	October 31, 1996
Exit Time/Date	**Permit Expiration Date**
3PM / 3/9/2017	October 31, 2001

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Ward Cooper, Environmental Manager
Office Phone: 208-245-7503, Cell Phone: 208-568-1023
Fax: 208-245-7542, Email: Ward.Cooper@potlatchcorp.com

Name, Address of Responsible Official/Title/Phone and Fax Number

Ward Cooper, Environmental Manager
Potlatch Corporation - Wood Division - St. Maries Complex
2200 Railroad Avenue, St. Maries, ID 83861
Office Phone: 208-245-7503, Fax: 208-245-7542

Contacted ☑ Yes ☐ No

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

NAICS:
321113 - Sawmills
321212 - Softwood Veneer & Plywood Manufacturing
321211 - Hardwood Veneer & Plywood Manufacturing
321912 - Cut Stock, Resawing Lumber and Planing

Located on the Coeur d'Alene Reservation

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

☑ Permit	☑ Self-Monitoring Program	☐ Pretreatment	☐ MS4
☑ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
☑ Facility Site Review	☐ Laboratory	☑ Storm Water	
☑ Effluent/Receiving Waters	☑ Operations & Maintenance	☐ Combined Sewer Overflow	
☑ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes SEV Description

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Matt Vojik	EPA /OCE / 206-553-0716	03/16/2017
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	OCE/MRE 3-0955	8/10/17

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS.
3-20-17

INSTRUCTIONS

Section A: National Data System Coding *(i.e., PCS)*

Column 1: Transaction Code: Use N, C, or D for New, Change, or Delete. All inspections will be *new* unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc.. *(Use the Remarks columns to record the State permit number, if necessary.)*

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Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

A Performance Audit
B Compliance Biomonitoring
C Compliance Evaluation (non-sampling)
D Diagnostic
F Pretreatment (Follow-up)
G Pretreatment (Audit)
I Industrial User (IU) Inspection
J Complaints
M Multimedia
N Spill
O Compliance Evaluation (Oversight)
P Pretreatment Compliance Inspection
R Reconnaissance
S Compliance Sampling
U IU Inspection with Pretreatment Audit
X Toxics Inspection
Z Sludge - Biosolids
Combined Sewer Overflow-Sampling
$ Combined Sewer Overflow-Non-Sampling
+ Sanitary Sewer Overflow-Sampling
& Sanitary Sewer Overflow-Non-Sampling
\ CAFO-Sampling
= CAFO-Non-Sampling
2 IU Sampling Inspection
3 IU Non-Sampling Inspection
4 IU Toxics Inspection
5 IU Sampling Inspection with Pretreatment
6 IU Non-Sampling Inspection with Pretreatment
7 IU Toxics with Pretreatment
! Pretreatment Compliance (Oversight)
@ Follow-up (enforcement)
{ Storm Water-Construction-Sampling
} Storm Water-Construction-Non-Sampling
: Storm Water-Non-Construction-Sampling
~ Storm Water-Non-Construction-Non-Sampling
< Storm Water-MS4-Sampling
- Storm Water-MS4-Non-Sampling
> Storm Water-MS4-Audit

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

A — State (Contractor)
B — EPA (Contractor)
E — Corps of Engineers
J — Joint EPA/State Inspectors—EPA Lead
L — Local Health Department (State)
N — NEIC Inspectors
O — Other Inspectors, Federal/EPA (Specify in Remarks columns)
P — Other Inspectors, State (Specify in Remarks columns)
R — EPA Regional Inspector
S — State Inspector
T — Joint State/EPA Inspectors—State lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

1 — Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2 — Industrial. Other than municipal, agricultural, and Federal facilities.
3 — Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
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5 — Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into ICIS-NPDES: K: CAFO, V: SSO, Y: CSO, W: Storm Water 9: MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.

United States Environmental Protection Agency
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	Exit Time/Date	Permit Expiration Date
	3PM / 3/9/2017	June 3, 2020

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

Ward Cooper, Environmental Manager
Office Phone: 208-245-7503, Cell Phone: 208-568-1023
Fax: 208-245-7542, Email: Ward.Cooper@potlatchcorp.com

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Ward Cooper, Environmental Manager
Potlatch Corporation - Wood Division - St. Maries Complex
2200 Railroad Avenue, St. Maries, ID 83861
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\ CAFO-Sampling
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NPDES Inspection Report

Permit # ID0000019 & IDR05I310

Potlatch Corporation - St. Maries Complex

St. Maries, ID

March 9, 2017

Prepared by:

Matt Vojik
Environmental Protection Agency (EPA), Region 10
Office of Compliance and Enforcement (OCE)
Multimedia Inspection & RCRA Enforcement Unit (MIREU)

Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Ward Cooper or from observations during the inspection.)

I. Facility Information

Facility Name:	Potlatch Corporation - St. Maries Complex
Facility Owner/Operator:	Potlatch Corporation
Physical/Mailing Address:	2200 Railroad Avenue, St. Maries, ID 83861
Lat/Long:	47.329167, -116.591667
NAICS Codes:	321113 - Sawmills 321212 - Softwood Veneer & Plywood Manufacturing 321211 - Hardwood Veneer & Plywood Manufacturing 321912 - Cut Stock, Resawing Lumber and Planing
Facility Contacts:	Ward Cooper, Environmental Manager Wood Products Division, St. Maries Complex Office Phone: 208-245-7503 Cell Phone: 208-568-1023 Fax: 208-245-7542 Email: Ward.Cooper@potlatchcorp.com Steve Henson, Manufacturing Manager Wood Products Division, St. Maries Complex Phone 1: 208-245-7535 Phone 2: 208-568-1701 Phone 3: 509-343-2836 Email: Steve.Henson@potlatchcorp.com
Permit Numbers:	ID0000019 & IDR05I310
Receiving Water:	St. Joe River

II. Inspection Information

Inspection Date:	March 9, 2017
Inspectors:	Matt Vojik, Inspector EPA Region 10, OCE / MIREU Phone: 206-553-0716
Arrival Time:	10:02 AM

Departure Time:	3:00 PM
Weather:	Rainy
Purpose:	To determine whether the facility is in compliance with their National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

III. Permit Information

This facility is permitted under the individual NPDES permit ID0000019. The permit became effective on October 31, 1996 and has been administratively extended since the expiration date of October 31, 2001.

The facility is also permitted under the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) with the tracking number IDR05I310. Coverage under the current MSGP became effective on March 3, 2017 after being on hold due to concerns expressed by the US Fish and Wildlife Service. Prior to the current MSGP, the facility maintained MSGP coverage under the tracking number IDR05B621. The current MSGP has an expiration date of June 3, 2020.

IV. Background

The facility encompasses 160 acres on the Coeur D'Alene Reservation and consists of a lumber mill, plywood plant, power plant, log storage yards and woody debris storage area. The individual permit covers the discharge of log yard runoff comingled with non-contact cooling water, which flows to Outfall 001. According to the facility's environmental manager, Mr. Ward Cooper, Outfall 001 is also covered under the MSGP along with three additional stormwater outfalls.

The facility was last inspected for NPDES permit compliance on July 24, 2012 by the EPA.

V. Inspection Chronology

On February 27, 2017, I emailed Mr. Scott Fields, Water Resources Program Manager with the Coeur d'Alene Tribe to notify him of the plan to inspect this facility on the Coeur d'Alene Reservation. Mr. Fields said that he would not be available to accompany me on the inspection.

This was an unannounced inspection. I arrived at the facility at 10:02am on March 9, 2017. I presented my credentials to Mr. Cooper and provided him with an EPA Small Business Resources Information Sheet. I was accompanied throughout the inspection by facility representatives. I was not denied access to the facility.

I began the inspection with a brief opening conference with Mr. Cooper and Mr. Steve Henson, Manufacturing Manager. After taking a tour of the facility, I conducted a file review. We ended with a closing conference to discuss observations and next steps.

VI. Opening Conference

Mr. Cooper said that the facility has operated in this location for approximately 52 years and has a workforce of approximately 350 employees. Potlatch Corporation also operates a lumber drying facility across town, which also has coverage under the MSGP (tracking number IDR53018). Mr. Cooper said that most of the facility's lumber is delivered across town for drying then returns to the mill for processing. He estimated that the facility's truck traffic to be approximately 1,600 vehicles per day.

The property consists of mostly unpaved areas on loose soil with a high water table. Mr. Cooper said that the facility applies gravel to unpaved surfaces, but the gravel sinks into the ground due to heavy equipment traffic. During dry conditions, Mr. Cooper said that the facility applies magnesium chloride to unpaved areas for dust control. The facility also uses a water sweeper to clean paved areas from approximately March to November.

Industrial areas include fuel storage tanks, a contact pond that collects recirculated process water from the conditioning vats and approximately ten baghouses that collect sawdust.

Mr. Cooper has worked at the facility for approximately five years. In December 2016, he said that he met with John Drabek, Margaret McCauley and Susan Poulsom in the NPDES Permits Unit to discuss the reissuance of the facility's permits.

VII. Site Review

Mr. Cooper took me on a tour of the facility. An aerial image, site map and drainage basin map appear in **Attachment A** and a photograph log appears in **Attachment B**.

I started the inspection in Drainage Basin Area 001, which is depicted in **Attachment A** and covers approximately 80% of the facility. Along the northern boundary of the property, a drainage ditch (**Photo 1**) channels flow to a stormwater treatment pond (**Photo 2**). A metal shipping container (**Photo 3**) located above the pond serves as a pump house. The pump house contains a flow meter and defoamer (**Photo 4**), which is injected into the effluent before being pumped to Outfall 001 (**Photo 5**). I also observed an oily sheen (**Photo 6**) on the gravel road in this area.

Along the southern boundary of the facility, I inspected Drainage Basin Area 004 (**Photo 7**), Monitoring Point 004 (**Photo 8**) and the point at which Outfall 004 discharges to Mutch Creek (**Photo 9**). In Drainage Basin Area 003, I observed turbid snowmelt flowing into Mutch Creek (**Photo 10**). I also inspected Monitoring Point 003 (**Photo 11**) and the discharge point from Outfall 003 (**Photo 12**). In Drainage Basin Area 002, I inspected the stormwater ponds (**Photo 13**) located upstream of Monitoring Point 002 (**Photo 14**).

In the southwestern portion of the facility, I inspected the woody debris storage area (**Photo 15**) and Tubbs Field (**Photo 16**), which consists of a low-lying wetland area between the woody debris storage area and the St. Joe River. At the base of a woody debris pile, I observed algal growth in puddles of stormwater (**Photo 17**). Mr. Cooper said that the city maintains a drainage ditch (**Photo 18**) that passes along the eastern edge of the woody debris storage area through Tubbs Field toward the St. Joe River.

VIII. File Review

I reviewed the following records:

- Discharge Monitoring Reports (DMRs) and associated sampling records
- Quality Assurance Plan (QAP) dated August 2012
- Stormwater Pollution Prevention Plan (SWPPP) dated March 14, 2016 and signed March 1, 2017. I reviewed the SWPPP on-site, but did not obtain a copy of the SWPPP.
- Stormwater Quarterly Visual Assessments for the past three years
- SWPPP Training Records for 2017

IX. Areas of Concern

I noted the following areas of concern:

A. Benchmark Exceedances

Part 8.A.6 of the MSGP identifies benchmarks that apply to the specific subsectors of Sector A (Timber Products).

Based on my review of benchmark monitoring data provided by Mr. Cooper during the inspection (**Attachment C**), the facility has repeatedly exceeded benchmarks for TSS, COD and zinc over the past five years at four different outfalls.

B. Effectiveness of Control Measures and Corrective Actions

Part 2.1 of the MSGP states that "you must select, design, install, and implement control measures (including best management practices) to minimize pollutant discharges."
AND
Part 6.2.1 of the MSGP states that benchmark monitoring data are used "to determine the overall effectiveness of your control measures and to assist you in knowing when additional corrective action(s) may be necessary."
AND
Part 6.2.1.2 of the MSGP states that "if the average of the 4 monitoring values for any parameter exceeds the benchmark, you must, in accordance with Part 3.2, review the selection, design, installation, and implementation of your control measures to determine if modifications are necessary to meet the effluent limits in this permit, and either: Make the necessary modifications… or make a determination that no further pollutant reductions are technologically available and economically practicable and achievable."

Although the facility has documented corrective actions in annual reports (**Attachment D**), monitoring data (**Attachment C**) indicate a continued need for improvements. It is unclear at this time whether proposed corrective actions for 2017 and 2018 (**Attachment E**) will produce monitoring results that are less than applicable benchmarks.

I also made the following observations, which suggest that further modifications to control measures may be necessary:

- I observed multiple turbid discharges and monitoring points (**Photos 8, 10, 11, 12 & 14**).
- I observed a foamy discharge at Outfall 001 (**Photo 5**).
- I observed an oily sheen (**Photo 6**) on the gravel road near Outfall 001.
- I observed algal growth in puddles of stormwater at the base of a woody debris pile (**Photo 17**).
- During my file review, I noted that quarterly visual assessment records over the past three years routinely described stormwater discharges as "grey" or "opaque."

C. Leachate from the Woody Debris Storage Area

Part 8.A.3.1. of the MSGP states "in areas where storage, loading and unloading, and material handling occur, perform good housekeeping to minimize the discharge of wood debris, leachate generated from decaying wood materials, and the generation of dust."
AND
Part 5.2.2 of the MSGP specifies components of the SWPPP site map that include: directions of stormwater flow and locations of stormwater control measures, monitoring points and outfalls.

The facility maintains a woody debris storage area (**Photo 15**) southwest of the facility. The storage area encompasses approximately six acres adjacent to Tubbs Field (**Photo 16**), which is a low-lying wetland area. In this storage area, I observed puddles of stormwater with algal growth (**Photo 17**), which could be indicative of elevated nutrient levels in leachate or runoff from this area. I did not observe a drainage path or a flowing discharge from the woody debris storage area at the time of the inspection. The storage area is located to the west of a drainage ditch (**Photo 18**) maintained by the city, which was frozen at the time of the inspection. After the inspection, I noted that past aerial imagery (**Attachment A**) shows that this drainage ditch has previously contained green algae-colored flow as well.

Mr. Cooper said that Tubbs Field experiences periodic flooding and I noted the potential for floodwaters to commingle with debris or leachate from the woody debris storage area. I also noted the potential for stormwater runoff from the woody debris storage area, but the facility does not monitor stormwater in this area and the SWPPP site map (**Attachment A**) does not identify stormwater flow directions, control measures, outfalls or monitoring points associated with the woody debris storage area.

D. Open Dumpsters

Part 2.1.2.2 of the MSGP states "keep all dumpster lids closed when not in use."

During the inspection, I observed approximately 20 open dumpsters containing wood waste and scrap metal throughout the facility.

E. Representative Hardness Value

Part 6.2.1.1 of the MSGP states that "if your facility is in one of the industrial sectors subject to benchmark concentrations that are hardness-dependent, you are required to submit to EPA with your NOI a hardness value, established consistent with the procedures in Appendix J, which is representative of your receiving water."

The facility has submitted a hardness value of 56.9 mg/L, which corresponds to a zinc benchmark of 0.08 mg/L under Part 8.A.6 of the MSGP. However, Mr. Cooper said that he and Mr. Scott Fields, Water Resources Program Manager with the Coeur d'Alene Tribe have taken subsequent receiving water samples with hardness values corresponding to a zinc benchmark of 0.04 mg/L. I advised Mr. Cooper to update the hardness value previously submitted to the EPA.

F. Magnesium Chloride for Dust Control

During dry conditions, Mr. Cooper said that the facility applies magnesium chloride to unpaved areas for dust control. Although magnesium chloride is commonly used as a dust suppressant on unpaved road surfaces, I noted after the inspection that runoff associated with salts and brines such as magnesium chloride can have negative ecological impacts as well.

First instance, Section 3.2.5 of environmental publication EPA/600/R-04/031, *Potential Environmental Impacts of Dust Suppressants*, states that the "application of dust suppressants, especially magnesium chloride, has been associated with the browning of trees along roadways and stunted vegetation growth in forestlands. Effects vary, because different plants have different tolerances. Aquatic ecosystems are affected by direct contamination from spills or runoff from off-site applications of dust suppressants. Fish may be affected by direct ingestion of toxic constituents or their degradation products. They are also sensitive to increased salinity resulting from salts and brine applications."

G. Defoamer Injection at Outfall 001

Mr. Cooper showed me that the facility adds a defoamer (**Photo 4**) to the effluent prior to discharge through Outfall 001. I questioned whether this additive was authorized for discharge under the individual permit. Mr. Cooper said that the defoamer is injected in small drips and that the facility has been using the same tote of defoamer for the five years that he has been at the facility. He also provided a safety data sheet for the defoamer (**Attachment F**), which states in Section 12 that "this product has no known ecotoxicological effects." After the inspection, I reviewed the individual permit and associated fact sheet, but did not find any references to chemical additives used for treatment of the discharge at Outfall 001.

H. Foamy Discharge

Section I.A. of the individual permit states that "surface waters of the state shall be free from floating, suspended, or submerged matter of any kind in concentrations causing nuisance or objectionable conditions or that may impair designated beneficial uses."
AND
Part 4.1 of the MSGP states that "you must review and revise, as appropriate, your SWPPP (e.g., sources of pollution; spill and leak procedures; non-stormwater discharges; the selection, design, installation and implementation of your control measures) so that this permit's effluent limits are met and pollutant discharges are minimized… whenever a visual assessment shows evidence of stormwater pollution (e.g.…. foam)."

Although the facility adds a defoamer to the effluent prior to discharge through Outfall 001, I noted that the discharge contained floating matter in the form of foam (**Photo 5**) at the time of the inspection. Mr. Cooper said this was not normal and he would check the defoamer injector after the inspection.

X. Closing Conference

I held a closing conference with Mr. Cooper and Mr. Henson. We discussed the areas of concern identified during the inspection and I gave a brief overview of the post-inspection process. I thanked them for their time and assistance.

Report Completion Date: 8/9/2017

Lead Inspector Signature: